

Saint Benedict Press, LLC – Privilege Log – November 24, 2017

Bates Stamped Number	Document Date	Type of Document	Person in Possession of the Document	Author of the Document	Reason for Not Producing
SBPP-00219	01/03/1974	Letter	Natalie D. Potter	Michael F. Roberts The Mercier Press Limited	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation
SBPP-00220	05/12/1973	Letter	Natalie D. Potter	Thomas A. Nelson	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation
SBPP-00221	11/29/1973	Letter	Natalie D. Potter	Michael F. Robert The Mercier Press Limited	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation
SBPP-00222	09/28/1973	Letter	Natalie D. Potter	Thomas A. Nelson	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation
SBPP-00242	Undated	Bookcover	Natalie D. Potter	Dr. Ludwig Ott	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation
SBPP-00245	09/16/1974	Letter	Natalie D. Potter	Thomas A. Nelson	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation
SBPP-00271	07/18/2011	Email	Natalie D. Potter	Brent Klaske	Redaction of email header – attorney/client privilege
SBPP-00278	02/05/2014	Email	Natalie D. Potter	Kathy Anderson	Redaction of email header – attorney/client privilege

Bates Stamped Number	Document Date	Type of Document	Person in Possession of the Document	Author of the Document	Reason for Not Producing
SBP- 02250-02253	Various	Spreadsheet – Redaction of certain customer names	Natalie D. Potter	Defendant	Confidential Proprietary Information
N/A	Various	Timelines created by counsel	Natalie D. Potter	Natalie D. Potter	Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial.
N/A	Various	Various Memorandums, attorney notes to and from client, and to insurance carrier representative	Natalie D. Potter & Defendant	Jonathan Buchan & Natalie D. Potter, Conor Gallagher	Attorney/client privilege, attorney work product, created in anticipation of litigation of for trial.
N/A	Various	Emails regarding case strategy and evaluation and related issues	Natalie D. Potter & Defendant	Jonathan Buchan & Natalie D. Potter, Conor Gallagher	Attorney/client privilege, attorney work product.
N/A	January 8, 2013	Emails regarding researching Plaintiff's claims	Natalie D. Potter & Defendant	Employee of Client and Sharon O'Donovan	Created in anticipation of litigation or for trial.
N/A	January 7, 2014 to January 21, 2014	Emails between Defendant's	Natalie D. Potter & Defendant	Rick Rotondi & Francesca Bressan	Created in anticipation of litigation or trial.

Bates Stamped Number	Document Date	Type of Document	Person in Possession of the Document	Author of the Document	Reason for Not Producing
		employee and Francesca Bressan regarding researching Plaintiff's claims			
N/A	November 8, 2017	Emails between current employee of client and former employee of client regarding evaluating Plaintiff's claims	Natalie D. Potter & Defendant	Mara Persic & Mary Lester	Created in anticipation of litigation or for trial.
N/A	Various	Print offs from various websites regarding research conducted by Defendant's employees in evaluation of Plaintiff's claims	Natalie D. Potter & Defendant		Created in anticipation of litigation or for trial.